R. Hance Haney

Executive Director – Federal Regulatory

1020 19th Street NW, Suite 700 Washington, DC 20036

202 429 3125 202 293 0561 fax Email hhaney@qwest.com



October 11, 2002

Ex Parte

Marlene H. Dortch Secretary Federal Communications Commission 445 12th Street, S.W., TW-B204 Washington, D.C. 20554

Re: WC Docket No. 02-314 – Application of Qwest

Communications International Inc. for Authorization to Provide In-Region, InterLATA Service in the States of Colorado, Idaho, Iowa, Montana, Nebraska, North

Dakota, Utah, Washington and Wyoming

Dear Ms. Dortch:

Qwest Communications International Inc. ("Qwest"), by its attorneys, submits this filing in response to questions raised by Commission staff in connection with Qwest's commercial performance data for the GA-1D and GA-7 PIDs reported in the Performance Results Summary submitted as part of the above-referenced Application.

All GA (Gateway Availability) PIDs are reported regionally so they are the same for all states in a given month. The Performance Results Summary submitted with the Application inadvertently included typographical errors that appeared in the "Met Std" column for GA-1D and GA-7. The same typographical errors appear consistently across all nine states in the spreadsheet.

For GA-1D, in the month of June, the reported result of 100% is correct and meets the benchmark. There should be a "Yes" in the "Met Std" column for all nine states.

For GA-7, in the months of May, June, and July, "N/A" should appear in the "Met Std" column for all nine states. GA-7 is a measure of "Timely Outage Resolution following Software Releases" for the five gateway applications described in the PID. In a given month, the denominator represents the number of outages that occur within two weeks of a software release that are attributable to the software. In all three of the months in question, there were zero outages that fit this description. The numerator is the number of these outages that are resolved within 48 hours. So the official results were zero over zero, an undefined number. The "CLEC Result" columns are blank because zero over zero is undefined. However, the "Met Std" column should be an "N/A" even though having zero outages is a positive, desirable result. In addition, "CLEC Volume" for each month

should be blank to be consistent with other measures in which no activity occurred. This applies to all three months for all nine states.

A corrected version of the Statewide Average Performance Summary, along with a breakout of the changes made, are attached.

The 20-page limit does not apply to this filing.

Sincerely,

cc: E. Yockus

M. Carowitz

G. Remondino

Hance Haney

J. Myles

R. Harsch

J. Jewel

P. Baker

C. Post

P. Fahn

B. Smith

J. Stanley

C. Washburn

S. Vick

S. Oxley

J. Orchard